IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

JESSIE HEARNS and GWENDOLYN HEARNS,)
Plaintiffs,)
VS.) No. 2:13-cv-02217) Jury Demanded
TRAVELERS PERSONAL SECURITY INSURANCE COMPANY,) July Demanded)
Defendant.)

JOINT MOTION TO AMEND SCHEDULING ORDER

Come now Plaintiffs Jessie and Gwendolyn Hearns and Defendant Travelers Personal Security Insurance Company ("Travelers"), by and through counsel, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and moves this Honorable Court for entry of an Order amending the existing Scheduling Order (ECF No. 7) by extending the deadlines as follows:

COMPLETING ALL DISCOVERY: May 30, 2014

- (a) **DOCUMENT PRODUCTION:** May 30, 2014
- (b) DEPOSITIONS, INTERROGATORIES AND REQUESTS FOR ADMISSIONS: May 30, 2014
- (c) EXPERT WITNESS DISCLOSURES (Rule 26):
 - (1) DISCLOSURE OF PLAINTIFFS' RULE 26 EXPERT INFORMATION:

 March 31, 2013
 - (2) DISCLOSURE OF DEFENDANT'S RULE 26 EXPERT

INFORMATION: April 30, 2014

(3) EXPERT WITNESS DEPOSITIONS: May 30, 2014

MOTIONS TO EXCLUDE EXPERTS/DAUBERT MOTIONS: June 30, 2014

FILING DISPOSITIVE MOTIONS: June 30, 2014

MANDATORY ADR: May 30, 2014

In support of this Joint Motion the parties rely on the Memorandum of Support filed contemporaneously herewith, along with the whole record in this cause.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/ Russell E. Reviere

Russell E. Reviere (BPR No. 07166)
Attorney for Defendant
209 East Main Street
P. O. Box 1147
Jackson, TN 38302-1147
(731) 423-2414
rreviere@raineykizer.com

s/ Kenneth D. McLean

Kenneth D. McLean (BPR #30472) Attorney for Plaintiffs P.O. Box 38161 Germantown, TN 38161 (901) 326-6888